

<p>UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK</p> <p>-----X</p> <p>DEVANDER SINGH,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">-against-</p> <p>RONALD POLES, PENSKE TRUCK LEASING CO., L.P., PENSKE TRUCK LEASING CORPORATION, COSTCO WHOLESALE CORPORATION, COSTCO WHOLESALE MEMBERSHIP, INC. and SAHIB S. WALIA,</p> <p style="text-align: center;">Defendants.</p> <p>-----X</p>	<p>19 CV 1984</p> <p>Letter Requesting Conference</p> <p>M. J. RML J. JBW</p>
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Filed by ECF only

Magistrate Judge Robert M. Levy
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Dear Judge Levy:

I am the attorney for the plaintiff in the above captioned case and write to request a conference, either by phone or in person.

The fact discovery deadline in this case is scheduled for November 20, 2019. We have, by repeated phone calls and certified letters over the course of several months, attempted to arrange the deposition and defense medical exam of my client. I have not heard from defense counsel as to scheduling and fear being unable to meet the Court imposed deadline. I have annexed copies of my certified letters with this correspondence. Thank you for your kind consideration herein.

Dated: Queens, N.Y.
October 7, 2019

Respectfully submitted,



STEPHEN A. SKOR, ESQ. (1027)
Attorney for Plaintiff
DEVANDER SINGH
114-08 101 Avenue, Second Floor
Richmond Hill, N.Y. 11419
(718) 850-6992

To: Bradley K. Bettridge, Esq. c/o
SIMMONS JANNACE DELUCA, LLP.
Attorneys for Defendants
RONALD POLES and COSTCO WHOLESALE CORPORATION
43 Corporate Drive
Hauppauge, New York 11788-2048
(631) 873-4888

STEPHEN A. SKOR, ESQ.
 ATTORNEY AT LAW
 114-08 101ST AVENUE, 2ND FLOOR
 RICHMOND HILL, N.Y. 11419
 TEL: (718) 850-6992 & TEL: (914) 434-6092
 FAX: (718) 850-6999

August 23, 2019

VIA CERTIFIED MAIL

7019 0160 0000 2301 9414

Bradley K. Bettridge, Esq. c/o
SIMMONS JANNACE DELUCA, LLP.
 43 Corporate Drive
 Hauppauge, New York 11788-2048

Re: Devander Singh v. Donald Poles, et al.
 D/Accident: June 7, 2018

Dear Mr. Bettridge:

As you are aware, I am the attorney for the plaintiff Devander Singh. Pursuant to the proceedings held before Magistrate Judge Robert M. Levy on May 22, 2019, the fact discovery deadline in this case is 11/20/19.

My office has provided all requested discovery and there is no discovery outstanding from the Plaintiff. **Plaintiff is available for a deposition and defense medical examinations.** Please call my EBT clerk ANGIE to set up depositions. I suggest the following dates:

September: 10, 12, 16
 October: 9, 15, 16, 21, 28, 31
 November: 4, 5, 6, 8, 11, 12, 14, 15

Very truly yours,

STEPHEN A. SKOR, ESQ. (1027)

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Devander Singh

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 RICHMOND HILL, N.Y. 11419
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 FAX: (718) 850-6999

August 30, 2019

VIA CERTIFIED MAIL

Bradley K. Bettridge, Esq. c/o
SIMMONS JANNACE DELUCA, LLP.
 43 Corporate Drive
 Hauppauge, New York 11788-2048

7019 0160 0000 2301 5027

Re: Devander Singh v. Donald Poles, et al.
 D/Accident: June 7, 2018

Dear Mr. Bettridge:

As you are aware, I am the attorney for the plaintiff Devander Singh. Pursuant to the proceedings held before Magistrate Judge Robert M. Levy on May 22, 2019, the fact discovery deadline in this case is 11/20/19.

Attached please find authorizations for your office to obtain all records/reports/bills from:
 1. Dr. Yehuda Kleinman; and,
 2. N.Y. Surgery Center of Queens.

SECOND REQUEST – WE HAVE NOT RECEIVED ANY RESPONSE FROM YOUR OFFICE

My office has provided all requested discovery and there is no discovery outstanding from the Plaintiff. **Plaintiff is available for a deposition and defense medical examinations.** Please call my EBT clerk ANGIE to set up depositions. I suggest the following dates:

September: 10, 12, 16
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08/30/2019
 Devander S

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September 30, 2019

7019 0160 0000 2301 5379

VIA CERTIFIED MAIL

Bradley K. Bettridge, Esq. c/o
 SIMMONS JANNACE DELUCA, LLP.
 43 Corporate Drive
 Hauppauge, New York 11788-2048

Re: Devander Singh v. Donald Poles, et al.
 D/Accident: June 7, 2018

Dear Mr. Bettridge:

As you are aware, I am the attorney for the plaintiff Devander Singh. Pursuant to the proceedings held before Magistrate Judge Robert M. Levy on May 22, 2019, the fact discovery deadline in this case is 11/20/19.

Attached please find a USB flash drive containing the non-privileged portions of Mr. Singh's prior file.

THIRD REQUEST – WE HAVE NOT RECEIVED ANY RESPONSE FROM YOUR OFFICE

My office has provided all requested discovery and there is no discovery outstanding from the Plaintiff. **Plaintiff is available for a deposition and defense medical examinations.** Please call my EBT clerk ANGIE to set up depositions. I suggest the following dates:

October: 9, 15, 16, 21, 28, 31

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